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April 23, 2014

VIA ECF

Hon. Debra Freeman, United States Magistrate Judge
United States District Court, S.D.N.Y.
500 Pearl St.
New York, NY 10007-1312

Re: Abdullah et al., v. Travelers Insurance Co.
13-CV-7825-LAK

Your Honor:

This firm represents plaintiffs in the above referenced matter and pursuant to the Court's direction, we herewith submit the parties' proposed briefing and discovery schedule.

PROPOSED BRIEFING SCHEDULE

- | | |
|--|----------------------|
| 1. Plaintiffs' Motion to Remand
to be served by | <u>May 8, 2014</u> |
| 2. Defendant's opposition to the motion
or Rule 11 motion to be served by | <u>June 5, 2014</u> |
| 3. Plaintiffs' Reply, or withdrawal of the
Motion to Remand by | <u>June 26, 2014</u> |
| 4. All motion papers to be filed by | <u>June 26, 2014</u> |

PROPOSED DISCOVERY SCHEDULE

- | | |
|--|---------------------|
| 1. Deadline for Π 's responses to Δ 's demands | <u>May 8, 2014</u> |
| 2. Deadline for Π 's requests for production
of documents & for interrogatories | <u>May 8, 2014</u> |
| 3. Deadline for Δ 's responses to Π 's demands | <u>June 2, 2014</u> |

Hon. Debra Freeman

April 23, 2014
Page 2

4. Deadline for depositions	<u>June 13, 2014</u>
5. Date for leave to join additional parties and or amendment of pleadings pursuant to Rules 15/16	<u>June 20, 2014</u>
6. Date for completion of factual discovery	<u>June 20, 2014</u>
7. Expert reports	<u>July 18, 2014</u>
8. Rebuttal Expert reports	<u>August 8, 2014</u>
9. Responsive Rebuttal Expert reports	<u>August 22, 2014</u>

The date of the telephone conference is subject to the Court's availability.

We thank your for your consideration of this matter.

Very truly yours,

/s/
MARC ILLISH (MI -6369)

CC: Finazzo Cossolini O'Leary Meola & Hager, LLC - Via ECF